



**CHEMICAL PROCESSORS, INC.**

2203 AIRPORT WAY SO., SUITE 400  
SEATTLE, WASHINGTON 98134

PHONE: (206) 223-0500

FAX: (206) 223-7791

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March 1, 1988

Laurence Ashley  
Washington Department of Ecology  
4350 - 150th Avenue N.E.  
Redmond, WA 98052-5301

Dear Mr. Ashley:

This is in response to your February 2, 1988 letter to Chemical Processors, Inc., in which you requested information concerning differences between the generators shipments to the Chempro Pier 91 facility and the Pier 91 records of shipments received.

Please find enclosed copies of the manifests listed in your February 2 letter. The discrepancies that occurred fall into several categories:

1. Shipments originally designated by the generator to Pier 91 were re-routed to either Chempro's Tacoma or Georgetown Seattle TSD facilities. The change in destination was noted on the manifests but were not always entered in the generator computer and therefore not correct in the generator annual reports.
2. Shipments of used oil that are reclaimed to be "burned for energy recovery" are frequently manifested to Pier 91. If the used oil meets the standards in 40 CFR 266.40 and WAC 173-303-515 it is blended for fuel used in marine diesel engines. These shipments are not a dangerous/hazardous waste and therefore should not be included in the Pier 91 annual report. Unfortunately the generator and Chempro computer entries for these shipments were not well coordinated and clarified as well as they are now, which caused inconsistencies in the 1986 annual reports.



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3. Shipments from the generator to Chempro in bulk tankers are generally described in "gallons" on line #13 of the Uniform Hazardous Waste Manifest. These quantities are converted to "pounds" in the annual report using a specific gravity conversion factor for that waste. These conversion factors are in the computer which then automatically makes the "gallon to pounds" conversion for each line entry on the annual report. The majority of the manifests listed in your February 2 letter have a 10 per cent or greater discrepancy in the pounds reported in the generator versus the Pier 91 1986 annual reports. The conversion factors used by the generator and Pier 91 were not always the same. This problem was not "caught" in the 1986 annual report but is being corrected. Sampling and laboratory analysis is being done to provide accurate conversion factors for each waste stream.

I hope this letter and the attachments satisfy your request for information in your February 2, 1988 letter. If you desire further information please contact me at (206) 223-0500.

Sincerely,



Peter K. Ressler  
Compliance Manager  
Chemical Processors, Inc.

PKR:tk

cc: W. E. Fisher  
M. P. Keller  
D. F. Stefani  
R. L. Atwood

Enclosures:

1. WDOE February 2, 1988 Letter
2. Shipping Manifest Copies
3. WDOE February 17, 1988 Letter
4. Chempro February 18, 1988 Letter